

EXHIBIT "B"

**Law Office of Shmuel Klein, PC**  
Attorneys and Counselors at Law

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113 Cedarhill Ave.  
Mahwah, NJ 07430  
201-529-3411  
State & Federal Court

December 6, 2007

Hon. Stephen C. Robinson  
U.S. District Court  
300 Quarropas St.  
White Plains, NY 10601

RE: David Shatz v. Law Office of Linda Strumpf, Esq.  
Case No: 07-CV-7129

Honorable Judge Robinson:

I am in receipt of Defendant Linda Strumpf's letter to Your Honor dated December 3, 2007, in which she responds to my letter addressed to the Court, sent on November 28, 2007.

In her letter, Defendant boldly claims that she is not a large debt collection firm. While she asserts that she is a sole practitioner, upon a search on the Webcivil e-Courts website, for Kings County, Queens County, Richmond County and Bronx County Civil Courts and the Auburn City Court cases, I have found that she has in fact filed 2360 cases in 2006 and 926 cases in 2007, in these Courts alone (See exhibit "A" attached hereto). Upon information and belief, all of these cases were consumer credit/debt collection cases, where she represented U.S. Equities Corp. While Plaintiff is without knowledge as to the allegation that Linda Strumpf is a solo practitioner, upon information and belief she has many office staff that handle collection matters. It is astounding how one attorney handles that many cases per year on her own, which is perhaps an explanation for the negligence in her failure to serve Plaintiff with a Summons and Complaint, and obtaining a Default Judgment in a Court of the wrong venue. Plaintiff never had an address in the Bronx, never resided there, and is a resident of Rockland County. Plaintiff does not owe any debt to U.S. Equities Corp., the Plaintiff whom Strumpf represented in that matter. Upon information and belief, Defendant has a pattern and practice of Sewer Service of Process. Furthermore, she is clearly a debt collector, as she wrote in her letter to our office on July 26, 2007. (See Exhibit "B" attached hereto.)

Defendant alleges that she is no longer using her old address, and advised the post office on August 16, 2007 of her new address. As seen from some recent cases filed by Defendant (attached hereto as Exhibit "C"), Defendant still uses the address and 111 John Street, New York, New York. Defendant is conveniently using the fact that she moved to deny her receipt of the Notice of Lawsuit and Request for Waiver of Service of Process.

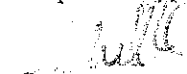
Defendant also states that she "ha[s] no valid address in "New Haven, CT " as was written in the second page, 1<sup>st</sup> paragraph of my November 28<sup>th</sup> letter to Your Honor. It is true that Defendant has an address in New Canaan, CT, not New Haven, CT. New Haven, CT was mistakenly typed by my secretary instead of New Canaan, but it is clear that the statement referred to Defendant Strumpf's Connecticut Address, at which she was served through the secretary of State, which she does not deny receipt of, the same address which was used by our office to mail a copy of Plaintiff's application for Default.

Defendant was served and willfully chose to ignore the Complaint filed against her, conveniently failing to respond. Therefore, it is proper that a Default Judgment be issued against Defendant.

Plaintiff respectfully prays that Your Honor deny Defendant's motion to dismiss the Complaint and enter a Default Judgment in favor of Plaintiff.

Based upon the above, it is once again further requested that Ms. Strumpf withdraw her motion pursuant to Rule 11.

Respectfully,



Shmuel Klein

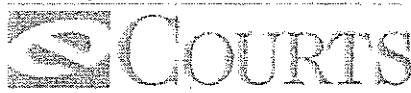
/za

Enclosures

cc: Linda Strumpf, Esq  
South Salem, NY  
New Caanen, CT



## New York State Unified Court System



## WebCivil Local - Case Search Results

2360 Case(s) Match Your Search Page 1 of 95 pages

[\[First Page\]](#) [\[Next Page\]](#) [\[Previous Page\]](#) [\[Last Page\]](#) Select Records Range:  [\[New Search\]](#) [\[Edit Search\]](#)

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	Court	Index Number	Case Status	Plaintiff	Plaintiff Firm	Defendant	Defendant Firm	Appearance Date	Judge/Part	
1	Auburn City Court	<a href="#">CV-000573-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	Robert A Burleson, II				
2	Auburn City Court	<a href="#">CV-000636-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	Douglas M Chapin				
3	Auburn City Court	<a href="#">CV-000637-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	Julie Ann Common				
4	Auburn City Court	<a href="#">CV-000638-06/AU</a>	Disposed	U S Equities Corp	Linda A. Strumpf	Amber L Brazee				
5	Auburn City Court	<a href="#">CV-000639-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	Kathy Colvin				
6	Auburn City Court	<a href="#">CV-000640-06/AU</a>	Active	U.S. Equities Corp	Linda A. Strumpf	Billiejean OHara				
7	Auburn City Court	<a href="#">CV-000740-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	James Klock				
8	Auburn City Court	<a href="#">CV-000741-06/AU</a>	Disposed	U.S. Equities Corp	Linda A. Strumpf	Barbara Shields				
9	Auburn City Court	<a href="#">CV-001140-06/AU</a>	Disposed	US Equities Corp	Linda A. Strumpf	Jennifer Burroughs				
10	Bronx County Civil Court	<a href="#">CV-000389-06/BX</a>	Active	U.S. EQUITIES CORP	LINDA STRUMPF	MARIA C. DEL CASTILLO			Honorable Lee A Mayersohn Part 11 - Self Represented Non-Jury	
11	Bronx County Civil Court	<a href="#">CV-006088-06/BX</a>	Post Disposition	U.S. EQUITIES CORP	LINDA STRUMPF	ETZER DELVA		11/07/2007	Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	M
12	Bronx County Civil Court	<a href="#">CV-009266-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	OBASI O EKEAGBARA			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	
13	Bronx County Civil Court	<a href="#">CV-009267-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	CINDY COOPER			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	
14	Bronx County Civil Court	<a href="#">CV-009268-06/BX</a>	Active	U.S. EQUITIES CORP	LINDA STRUMPF	ALFRED D HALES			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	
15	Bronx County Civil Court	<a href="#">CV-009269-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	PATRICIA S KING			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	
16	Bronx County Civil Court	<a href="#">CV-009270-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	LUZ L SIERRA			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury	
17	Bronx	<a href="#">CV-009271-06/BX</a>	Disposed	U S	LINDA	WILLIAM D			Honorable Francis	

	County Civil Court			EQUITIES CORP	STRUMPF	KING			M. Alessandro Part 11 - Self Represented Non-Jury
18	Bronx County Civil Court	<a href="#">CV-009272-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	AGGREY F MCGREGOR			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
19	Bronx County Civil Court	<a href="#">CV-009273-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	DEDNICK O WILLIAMS			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
20	Bronx County Civil Court	<a href="#">CV-009274-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MARIA MARTINEZ			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
21	Bronx County Civil Court	<a href="#">CV-009275-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	AGGREY F MCGREGOR			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
22	Bronx County Civil Court	<a href="#">CV-009276-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	FANGLUN CHAI			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
23	Bronx County Civil Court	<a href="#">CV-009277-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	CORRINE I ZEPHIR			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
24	Bronx County Civil Court	<a href="#">CV-009278-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	CAMAY T CROOMS			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury
25	Bronx County Civil Court	<a href="#">CV-009279-06/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	KIM ANITA WILSON			Honorable Francis M. Alessandro Part 11 - Self Represented Non-Jury

[First Page] [Next Page] [Previous Page] [Last Page] Select Records Range:

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[\[First Page\]](#) [\[Next Page\]](#) [\[Previous Page\]](#) [\[Last Page\]](#) Select Records Range:  [\[New Search\]](#) [\[Edit Search\]](#)

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	Court	Index Number	Case Status	Plaintiff	Plaintiff Firm	Defendant	Defendant Firm	Appearance Date	Judge/Part
1	Bronx County Civil Court	<a href="#">CV-001441-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	IRIS M SOTOMAYOR			Honorable Thomas D. Raffaele Part 11 - Self Represented
1	Bronx County Civil Court	<a href="#">CV-001441-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	IRIS M SOTOMAYOR			Honorable Thomas D. Raffaele Part 11 - Self Represented
2	Bronx County Civil Court	<a href="#">CV-001442-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	JOAN M LAWTON			Honorable Thomas D. Raffaele Part 11 - Self Represented
2	Bronx County Civil Court	<a href="#">CV-001442-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	JOAN M LAWTON			Honorable Thomas D. Raffaele Part 11 - Self Represented
3	Bronx County Civil Court	<a href="#">CV-001443-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	JOSEPH M SENAT			Honorable Thomas D. Raffaele Part 11 - Self Represented
3	Bronx County Civil Court	<a href="#">CV-001443-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	JOSEPH M SENAT			Honorable Thomas D. Raffaele Part 11 - Self Represented
4	Bronx County Civil Court	<a href="#">CV-001444-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	LISA M MARCHUCK			Honorable Thomas D. Raffaele Part 11 - Self Represented
4	Bronx County Civil Court	<a href="#">CV-001444-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	LISA M MARCHUCK			Honorable Thomas D. Raffaele Part 11 - Self Represented
5	Bronx County Civil Court	<a href="#">CV-001445-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MARIA G BECERRA			Honorable Thomas D. Raffaele Part 11 - Self Represented
5	Bronx County Civil Court	<a href="#">CV-001445-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MARIA G BECERRA			Honorable Thomas D. Raffaele Part 11 - Self Represented
6	Bronx County Civil Court	<a href="#">CV-001446-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MARK DONTAY GOODSON			Honorable Thomas D. Raffaele Part 11 - Self Represented
6	Bronx County Civil Court	<a href="#">CV-001446-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MARK DONTAY GOODSON			Honorable Thomas D. Raffaele Part 11 - Self Represented
7	Bronx County Civil Court	<a href="#">CV-001447-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	NICHOLAS SALZARULO			Honorable Thomas D. Raffaele Part 11 - Self Represented
7	Bronx County Civil Court	<a href="#">CV-001447-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	NICHOLAS SALZARULO			Honorable Thomas D. Raffaele Part 11 - Self Represented



								Represented
8	Bronx County Civil Court	CV-001448-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	OJCEKO V GIZELGUL		Honorable Thomas D. Raffaele Part 11 - Self Represented
8	Bronx County Civil Court	CV-001448-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	OJCEKO V GIZELGUL		Honorable Thomas D. Raffaele Part 11 - Self Represented
9	Bronx County Civil Court	CV-001449-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	OSCAR E ALAS		Honorable Thomas D. Raffaele Part 11 - Self Represented
9	Bronx County Civil Court	CV-001449-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	OSCAR E ALAS		Honorable Thomas D. Raffaele Part 11 - Self Represented
10	Bronx County Civil Court	CV-001450-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	RICHARD W MCLOUGHLIN		Honorable Thomas D. Raffaele Part 11 - Self Represented
10	Bronx County Civil Court	CV-001450-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	RICHARD W MCLOUGHLIN		Honorable Thomas D. Raffaele Part 11 - Self Represented
11	Bronx County Civil Court	CV-001451-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	SANDRA M HULSIZER		Honorable Thomas D. Raffaele Part 11 - Self Represented
11	Bronx County Civil Court	CV-001451-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	SANDRA M HULSIZER		Honorable Thomas D. Raffaele Part 11 - Self Represented
12	Bronx County Civil Court	CV-011367-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	DANIEL MEDINA		Honorable Thomas D. Raffaele Part 11 - Self Represented
12	Bronx County Civil Court	CV-011367-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	DANIEL MEDINA		Honorable Thomas D. Raffaele Part 11 - Self Represented
13	Bronx County Civil Court	CV-012188-07/BX	Active	U.S. EQUITIES CORP	LINDA STRUMPF	TAVIER JONES		Honorable Thomas D. Raffaele Part 11 - Self Represented
13	Bronx County Civil Court	CV-012188-07/BX	Active	U.S. EQUITIES CORP	LINDA STRUMPF	TAVIER JONES		Honorable Thomas D. Raffaele Part 11 - Self Represented
14	Bronx County Civil Court	CV-012189-07/BX	Active	U.S. EQUITIES CORP	LINDA STRUMPF	ANNETTE DANIELS	08/14/2007	Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
14	Bronx County Civil Court	CV-012189-07/BX	Active	U.S. EQUITIES CORP	LINDA STRUMPF	ANNETTE DANIELS	08/14/2007	Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
15	Bronx County Civil Court	CV-012190-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	LOUIS R GONZALEZ		Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
15	Bronx County Civil Court	CV-012190-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	LOUIS R GONZALEZ		Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
16	Bronx County Civil Court	CV-012191-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MALIK BROWN		Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
16	Bronx County Civil Court	CV-012191-07/BX	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	MALIK BROWN		Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
17	Bronx	CV-012192-07/BX	Active	U.S. EQUITIES	LINDA	LISA REDWINE		Honorable Thomas

	County Civil Court			CORP	STRUMPF				D Raffaele Part 11 - Self Represented Non-Jury
17	Bronx County Civil Court	<a href="#">CV-012192-07/BX</a>	Active	U.S. EQUITIES CORP	LINDA STRUMPF	LISA REDWINE			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
18	Bronx County Civil Court	<a href="#">CV-012193-07/BX</a>	Active	U.S. EQUITIES CORP	LINDA STRUMPF	LENNOX BUTLER			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
18	Bronx County Civil Court	<a href="#">CV-012193-07/BX</a>	Active	U.S. EQUITIES CORP	LINDA STRUMPF	LENNOX BUTLER			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
19	Bronx County Civil Court	<a href="#">CV-012194-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	EDGARDO N SILVA			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
19	Bronx County Civil Court	<a href="#">CV-012194-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	EDGARDO N SILVA			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
20	Bronx County Civil Court	<a href="#">CV-012195-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	EILEEN A MARTINEZ			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
20	Bronx County Civil Court	<a href="#">CV-012195-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	EILEEN A MARTINEZ			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
21	Bronx County Civil Court	<a href="#">CV-012196-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	FRED A SHERRY			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
21	Bronx County Civil Court	<a href="#">CV-012196-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	FRED A SHERRY			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
22	Bronx County Civil Court	<a href="#">CV-012197-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	GILBERT H LAVALLEY			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
22	Bronx County Civil Court	<a href="#">CV-012197-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	GILBERT H LAVALLEY			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
23	Bronx County Civil Court	<a href="#">CV-012198-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	GLENN VOSBURGH			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
23	Bronx County Civil Court	<a href="#">CV-012198-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	GLENN VOSBURGH			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
24	Bronx County Civil Court	<a href="#">CV-012199-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	HUMBERTO M BARBOSA			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
24	Bronx County Civil Court	<a href="#">CV-012199-07/BX</a>	Disposed	U.S. EQUITIES CORP	LINDA STRUMPF	HUMBERTO M BARBOSA			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury
25	Bronx	<a href="#">CV-020427-07/BX</a>	Active	U S EQUITIES	LINDA	LEROY			Honorable Thomas



	County Civil Court			CORP	STRUMPF	ROBINSON			D. Raffaele Part 11 - Self Represented Non-Jury
25	Bronx County Civil Court	CV-020427-07/BX	Active	U.S.EQUITIES CORP.	LINDA STRUMPF	LEROY ROBINSON			Honorable Thomas D. Raffaele Part 11 - Self Represented Non-Jury

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 m 3) No answer  
 m 2) Busy  
 m 4) No facsimile connection  
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LINDA STRUMPF  
 ATTORNEY AT LAW

Substantive practice  
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 New Jersey  
 Connecticut

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 FAX: (212) 596-8900  
 NEW JERSEY OFFICE  
 38 HAWKTON STREET  
 NEWARK, NJ 07102  
 TEL: (973) 344-2121  
 FAX: (973) 324-7550  
 CONNECTICUT OFFICE  
 304 BELLONIA BLVD  
 NEW CANAAN, CT 06840  
 TEL: (203) 261-8552  
 FAX: (203) 261-8550

July 26 2007

Shmuel Klein Esq.  
 Law Office of Shmuel Klein P.C.  
 266 West Route 58  
 Spring Valley, NY 10977

Re: U.S. Equities Corp. v. David Shatz  
 Index No. 105569/06

Dear Mr. Klein:

To the best of my knowledge, I have not committed any violation of any law. If you claim that I committed a violation, please specifically advise what that violation is. Otherwise, if you wish to receive this debt, please call Mr. Hal Siegel at extension 120.

This is an attempt to collect this debt, and any information obtained will be used for that purpose.

Very truly yours,

LINDA STRUMPF

Fax - 345-423-7362

Our File No. 57395

1692013

Exh. B





New York State Unified Court System

*WebCivil Local - Case Detail*

Court: **Queens County Civil Court** Index Number: **CV-133557-07/QU**  
Case Name: **U.S. EQUITIES CORP.**  
**vs.**  
**CHEN, XIAOLING LING**  
Case Type: **Civil**  
Classification: **Consumer Credit**  
Filing Date: **10/15/2007**  
Disposition Date:  
Calendar Number:  
Jury Demand: **No**  
Judge Name:

Attorney/Firm(s) For Plaintiff - U.S. EQUITIES CORP.:

**Linda A. Strumpf** Attorney Type: **Attorney**  
**111 John St Rm 800**  
**New York, New York 10038**  
**(212) 566-6800 ext:**

Attorney/Firm(s) For Defendant - XIAOLING LING CHEN:

Exh. C



New York State Unified Court System

*WebCivil Local - Case Detail*

Court: **Queens County Civil Court** Index Number: **CV-133588-07/QU**  
Case Name: **U.S. EQUITIES CORP.**  
**vs.**  
**HOU, PING**  
**FENG, SUFEN**  
Case Type: **Civil**  
Classification: **Consumer Credit**  
Filing Date: **10/15/2007**  
Disposition Date:  
Calendar Number:  
Jury Demand: **No**  
Judge Name:

Attorney/Firm(s) For Plaintiff - U.S. EQUITIES CORP.:

**Linda A. Strumpf** Attorney Type: **Attorney**  
**111 John St Rm 800**  
**New York, New York 10038**  
**(212) 566-6800 ext:**

Attorney/Firm(s) For Defendant - SUFEN FENG:

Attorney/Firm(s) For Defendant - PING HOU: